

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION

4                               -   -   -  
5   IN RE:   NATIONAL               :   MDL NO. 2804  
6   PRESCRIPTION OPIATE       :  
7   LITIGATION                   :  
8   -----

9                               :   CASE NO.  
10   THIS DOCUMENT               :   1:17-MD-2804  
11   RELATES TO ALL CASES:  
12                               :   Hon. Dan A.  
13                               :   Polster  
14                               -   -   -

15                               Thursday, January 24, 2019  
16                               -   -   -

17   HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
18   CONFIDENTIALITY REVIEW  
19                               -   -   -

20                               Videotaped deposition of  
21   LARRY RINGGOLD, taken pursuant to notice,  
22   was held at Homewood Suites by Hilton  
23   4170 Philadelphia Road, Bel Air, Maryland  
24   21015, beginning at 5:01 p.m., on the  
25   above date, before Amanda Dee  
26   Maslynsky-Miller, a Certified Realtime  
27   Reporter.  
28                               -   -   -

29                               GOLKOW LITIGATION SERVICES  
30   877.370.3377 ph | 917.591.5672 fax  
31   deps@golkow.com  
32

Page 2

1 APPEARANCES:

2

3 BARON & BUDD, P.C.

4 BY: WILLIAM POWERS, ESQUIRE

5 EMMA KABOLI, PARALEGAL

6 600 New Hampshire Avenue NW

7 Suite 10A

8 Washington, DC 20037

9 Wpowers@baronbudd.com

10 Ekaboli@baronbudd.com

11 Representing the Plaintiffs

12

13 MORGAN, LEWIS & BOCKIUS LLP

14 BY: JOHN P. LAVELLE, JR., ESQUIRE

15 1701 Market Street

16 Philadelphia, Pennsylvania 19103

17 (215) 963-4824

18 John.lavelle@morganlewis.com

19 - and -

20 BY: MATTHEW R. LADD, ESQUIRE

21 101 Park Avenue

22 New York, New York 10178

23 (212) 309-6141

24 Matthew.ladd@morganlewis.com

Representing the Defendant,

Rite Aid

Page 4

1 - - -

2 I N D E X

3 - - -

4

5 Testimony of: LARRY RINGGOLD

6 By Mr. Powers 8

7 By Mr. Lavelle 107

8

9 - - -

10 E X H I B I T S

11

12 NO. DESCRIPTION PAGE

13 Rite Aid-Ringgold

14 Exhibit-1 Rite\_Aid\_OMDL\_0049982-993 39

15

16 Rite Aid-Ringgold

17 Exhibit-2 Rite\_Aid\_OMDL\_0032421 46

18 Rite Aid-Ringgold

19 Exhibit-3 Rite\_Aid\_OMDL\_0032422 46

20

21 Rite Aid-Ringgold

22 Exhibit-4 Rite\_Aid\_OMDL\_0027551-552 57

23 Rite Aid-Ringgold

24 Exhibit-5 Rite\_Aid\_OMDL\_21461-463 64

25

26 Rite Aid-Ringgold

27 Exhibit-6 Rite\_Aid\_OMDL\_23456-457 69

28 Rite Aid-Ringgold

29 Exhibit-7 Rite\_Aid\_OMDL\_0012020-021 79

30

31 Rite Aid-Ringgold

32 Exhibit-8 Rite\_Aid\_OMDL\_0011115-116 90

Page 3

1 APPEARANCES: (Continued)

2 VIA TELEPHONE/LIVESTREAM:

3

4 GIBBONS PC

5 BY: PAUL E. ASFENDIS, ESQUIRE

6 One Pennsylvania Plaza

7 37th Floor

8 New York, New York 10119

9 (212) 613-2000

10 Pasfendis@gibbonslaw.com

11 Representing the Defendant,

12 AmerisourceBergen Corporation

13

14 JONES DAY

15 BY: JASON Z. ZHOU, ESQUIRE

16 77 West Wacker

17 Chicago, Illinois 60601

18 (312) 782-3939

19 Jzhou@jonesday.com

20 Representing the Defendant,

21 Walmart

22

23 ARNOLD & PORTER KAYE SCHOLER LLP

24 BY: JOHN D. LOMBARDO, ESQUIRE

44th Floor

777 South Figueroa Street

Los Angeles, California 90017

(213) 243-4000

John.lombardo@arnoldporter.com

Representing the Defendant,

Endo Pharmaceuticals, Endo Health,

and Par Pharmaceuticals

ALSO PRESENT:

Dan Lawlor, Videographer

Jeff Sayres, Trial Technician

Page 5

1 - - -

2 E X H I B I T S

3 - - -

4

5 NO. DESCRIPTION PAGE

6 Rite Aid-Ringgold

7 Exhibit-9 Rite\_Aid\_OMDL\_0003108-109 95

8

9 Rite Aid-Ringgold

10 Exhibit-10 Rite\_Aid\_OMDL\_0010795-796 100

11 Rite Aid-Ringgold

12 Exhibit-11 Rite\_Aid\_OMDL\_0003562 111

13

14

15

16

17

18

19

20

21

22

23

24

<p style="text-align: right;">Page 6</p> <p>1                   - - -</p> <p>2           DEPOSITION SUPPORT INDEX</p> <p>3                   - - -</p> <p>4</p> <p>5 Direction to Witness Not to Answer</p> <p>6 Page Line   Page Line   Page Line</p> <p>7 None</p> <p>8</p> <p>9</p> <p>10 Request for Production of Documents</p> <p>11 Page Line   Page Line   Page Line</p> <p>12 None</p> <p>13</p> <p>14</p> <p>15 Stipulations</p> <p>16 Page Line   Page Line   Page Line</p> <p>17 7    1</p> <p>18</p> <p>19</p> <p>20 Question Marked</p> <p>21 Page Line   Page Line   Page Line</p> <p>22 None</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 8</p> <p>1           on the stenographic record. The</p> <p>2           court reporter is Amanda Miller</p> <p>3           and will now swear in the witness.</p> <p>4                   - - -</p> <p>5           LARRY RINGGOLD, after having</p> <p>6           been duly sworn, was examined and</p> <p>7           testified as follows:</p> <p>8                   - - -</p> <p>9           EXAMINATION</p> <p>10                   - - -</p> <p>11 BY MR. POWERS:</p> <p>12           Q.   Good evening, Mr. Ringgold.</p> <p>13           My name is Will Powers, and I represent</p> <p>14           the plaintiffs in this litigation.</p> <p>15           Before we get started, can</p> <p>16           you please just state your full name and</p> <p>17           spell it for the record?</p> <p>18           A.   Larry Ringgold, Junior,</p> <p>19           L-A-R-R-Y, R-I-N-G-G-O-L-D.</p> <p>20           Q.   And we're here for your</p> <p>21           deposition today.</p> <p>22           Do you understand that?</p> <p>23           A.   Yes.</p> <p>24           Q.   Have you ever been deposed</p>
<p style="text-align: right;">Page 7</p> <p>1                   - - -</p> <p>2           (It is hereby stipulated and</p> <p>3           agreed by and among counsel that</p> <p>4           sealing, filing and certification</p> <p>5           are waived; and that all</p> <p>6           objections, except as to the form</p> <p>7           of the question, will be reserved</p> <p>8           until the time of trial.)</p> <p>9                   - - -</p> <p>10          VIDEO TECHNICIAN: We are</p> <p>11          now on the record. My name Ray</p> <p>12          Moore, I'm a videographer for</p> <p>13          Golkow Litigation Services.</p> <p>14          Today's date is January 24, 2019,</p> <p>15          and the time is 5:01 p.m.</p> <p>16          This video deposition is</p> <p>17          being held in Bel Air, Maryland,</p> <p>18          in the matter In Re National</p> <p>19          Prescription Opiate Litigation for</p> <p>20          the United States District Court</p> <p>21          for the Northern District of Ohio,</p> <p>22          Eastern Division, MDL Number 2804.</p> <p>23          The deponent is Larry</p> <p>24          Ringgold. Counsel will be noted</p>	<p style="text-align: right;">Page 9</p> <p>1 before?</p> <p>2           A.   No.</p> <p>3           Q.   I want to just go over a</p> <p>4           couple of ground rules before we get</p> <p>5           started to make sure we're all on the</p> <p>6           same page.</p> <p>7           Because the court reporter</p> <p>8           is writing down what is being said, it's</p> <p>9           important that only one of us is speaking</p> <p>10          at a time. So even if you think you know</p> <p>11          where I'm going with a question, please</p> <p>12          don't jump in. We want to make sure I</p> <p>13          finish my question before you answer --</p> <p>14          give your answer, and I'll let you give</p> <p>15          your answer before I ask the question.</p> <p>16          Is that okay?</p> <p>17          A.   Yes.</p> <p>18          Q.   And also, when you're</p> <p>19          answering my questions, I need verbal</p> <p>20          answers; so no nods of the head, shrugs</p> <p>21          of the shoulders, uh-huh or uh-uh, stuff</p> <p>22          like that.</p> <p>23          Is that all right?</p> <p>24          A.   That's all right.</p>

<p style="text-align: right;">Page 10</p> <p>1 Q. And if for any reason you</p> <p>2 don't understand a question or it</p> <p>3 requires some sort of clarification, you</p> <p>4 have to tell me, and we can get that</p> <p>5 matter resolved before you answer the</p> <p>6 question.</p> <p>7 Is that okay?</p> <p>8 A. Yes.</p> <p>9 Q. So I'll assume, then, if you</p> <p>10 answer a question, you understand my</p> <p>11 question.</p> <p>12 Is that all right?</p> <p>13 A. Yes.</p> <p>14 Q. Are you currently suffering</p> <p>15 from any medical diseases or illnesses</p> <p>16 that in any way interfere with your</p> <p>17 ability to answer truthfully and</p> <p>18 completely my questions here tonight?</p> <p>19 A. No.</p> <p>20 Q. And I just ask that you keep</p> <p>21 your voice up a little bit, because</p> <p>22 everything is being recorded as well,</p> <p>23 okay?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 12</p> <p>1 you need them. But if you have a</p> <p>2 question pending while -- I need you to</p> <p>3 answer that question before we take the</p> <p>4 break.</p> <p>5 Is that okay?</p> <p>6 A. Yes.</p> <p>7 MR. LAVELLE: The witness</p> <p>8 reserves the right to consult with</p> <p>9 counsel on issues of privilege.</p> <p>10 BY MR. POWERS:</p> <p>11 Q. Okay, Mr. Ringgold. I want</p> <p>12 to start with your educational</p> <p>13 background.</p> <p>14 Did you complete high</p> <p>15 school?</p> <p>16 A. Yes.</p> <p>17 Q. Where did you complete high</p> <p>18 school?</p> <p>19 A. Aberdeen Senior High School.</p> <p>20 Q. And what year was that?</p> <p>21 A. 1985.</p> <p>22 Q. Any education beyond high</p> <p>23 school?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. Are you currently taking any</p> <p>2 medication or drugs that may in any way</p> <p>3 interfere with your ability to answer my</p> <p>4 questions truthfully and completely?</p> <p>5 A. No.</p> <p>6 Q. And do you understand the</p> <p>7 court reporter has sworn you in and</p> <p>8 you're under oath here today just as you</p> <p>9 would be in a courtroom at trial?</p> <p>10 A. Yes.</p> <p>11 Q. And because you are under</p> <p>12 oath, if you lie or provide intentionally</p> <p>13 misleading answers, you may be subject to</p> <p>14 criminal or civil penalties.</p> <p>15 Do you understand that?</p> <p>16 A. Yes.</p> <p>17 Q. And your counsel may, from</p> <p>18 time to time, object. But I'm still</p> <p>19 entitled to answer to my question, unless</p> <p>20 your counsel specifically instructs you</p> <p>21 not to answer.</p> <p>22 Do you understand that?</p> <p>23 A. Yes.</p> <p>24 Q. And we can take breaks when</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. What education do you have</p> <p>2 beyond high school?</p> <p>3 A. Some years at Bowie State</p> <p>4 University.</p> <p>5 Q. And that's spelled</p> <p>6 B-O-W-I-E, right?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Did you get a degree from</p> <p>9 Bowie State?</p> <p>10 A. I didn't finish, no.</p> <p>11 Q. Did you ever complete a</p> <p>12 college degree?</p> <p>13 A. No.</p> <p>14 Q. Besides your years at Bowie</p> <p>15 State, any other education beyond high</p> <p>16 school?</p> <p>17 A. Just military, military</p> <p>18 stuff.</p> <p>19 Q. When were you in the</p> <p>20 military?</p> <p>21 A. From 1990 to 1998.</p> <p>22 Q. What did you do after you</p> <p>23 left the military in 1998?</p> <p>24 A. I think I worked at, in</p>

<p style="text-align: right;">Page 14</p> <p>1 19 -- when I got out -- I think while I  2 was still in, I was still working, it was  3 the Army National Guard. So I worked at  4 The Gap.  5 Q. So just to be clear, when  6 you're in the military, you were with the  7 Army National Guard?  8 A. Yes, sir.  9 Q. And you also had employment  10 at The Gap while you were concurrently  11 employed with the Army National Guard?  12 A. Yes.  13 Q. And you said you had some  14 education while you were in the military.  15 What was the nature of that  16 education?  17 A. I worked on the Arcola  18 helicopter weapon systems. So they would  19 send us out to different schools, and we  20 would do different things in Texas to  21 kind of keep us up to speed on different  22 electronics and troubleshooting the  23 aircraft.  24 Q. Any other education that we</p>	<p style="text-align: right;">Page 16</p> <p>1 that would be?  2 A. I'm just thinking, I mean,  3 just general stuff with the job. They  4 would send us on little stuff. I can't  5 really recall at the moment.  6 Q. Any education on controlled  7 substances?  8 A. Education on controlled  9 substances? The only thing we did do a  10 DEA -- like a little thing they sent us  11 to, I think it was Fort Lauderdale once.  12 Q. And who is "they"?  13 A. The job.  14 Q. When you say "the job," you  15 mean your job at --  16 A. Rite Aid.  17 Q. -- Rite Aid?  18 MR. LAVELLE: And just wait  19 until the question is finished  20 before you answer the question.  21 THE WITNESS: Yes, sir.  22 BY MR. POWERS:  23 Q. So besides what you just  24 talked about there when you were with</p>
<p style="text-align: right;">Page 15</p> <p>1 have not talked about yet?  2 A. Not that I can recall. I  3 have some other stuff that I'm missing,  4 but that's basically it.  5 MR. LOMBARDO: Apologies for  6 the interruption. The telephone  7 is not picking up the witness's  8 testimony. Is there a mic near  9 the witness?  10 - - -  11 (Whereupon, a discussion off  12 the record occurred.)  13 - - -  14 BY MR. POWERS:  15 Q. So, Mr. Ringgold, as you  16 just heard, I think we both have to just  17 keep our voices up a little bit so  18 everyone on the phone can hear.  19 Is that okay?  20 A. Yes.  21 Q. You said that there might  22 be -- might be some other education that  23 you might be missing.  24 Do you have any idea what</p>	<p style="text-align: right;">Page 17</p> <p>1 Rite Aid, any other education about  2 controlled substances prior to joining  3 Rite Aid?  4 A. No.  5 Q. And when did you join Rite  6 Aid?  7 A. September of 2000.  8 Q. And you mentioned previously  9 there that they, meaning Rite Aid, sent  10 you to Fort Lauderdale once.  11 When was that?  12 A. I don't remember. It was a  13 long time ago.  14 Q. More than ten years ago?  15 A. Possibly.  16 Q. And why did Rite Aid send  17 you to Fort Lauderdale?  18 A. It was a DEA conference.  19 Just to get the experience of being  20 around some of the DEA and things like  21 that.  22 Q. Did anyone else go with you  23 to this conference from Rite Aid?  24 A. They meaning who?</p>

<p style="text-align: right;">Page 18</p> <p>1 Q. You said you went to a DEA  2 conference in Fort Lauderdale.  3 Did anyone else from Rite  4 Aid come with you to go to that DEA --  5 A. Yes.  6 Q. -- conference?  7 Let me finish my question.  8 I know you know where I'm going with it,  9 but just let me finish and then you can  10 answer, okay?  11 A. Yes.  12 Q. So let me ask that again.  13 The DEA conference that Rite  14 Aid sent you to in Fort Lauderdale, did  15 anyone else from Rite Aid come with you?  16 A. Yes.  17 Q. Who?  18 A. Debra Chase.  19 Q. And who is Debra Chase?  20 A. At the time, Debra Chase was  21 DEA coordinator for the Rx department.  22 Q. And you called it a DEA  23 conference.  24 Was it a conference that was</p>	<p style="text-align: right;">Page 20</p> <p>1 remember.  2 BY MR. POWERS:  3 Q. Do you know, when you went  4 back to your job at Rite Aid, did you  5 talk to anyone about what you saw at the  6 conference?  7 A. No.  8 Q. Did you go to any other  9 conferences put on by Buzzeo besides the  10 one in Fort Lauderdale?  11 A. No.  12 Q. Did you go to any other  13 conferences where the DEA had a presence?  14 A. No.  15 Q. Did you talk to any DEA  16 agents at the Buzzeo conference in Fort  17 Lauderdale?  18 A. No.  19 Q. Do you know if Debra Chase  20 talked to any DEA agents at the  21 conference in Fort Lauderdale?  22 A. I would not know that.  23 Q. Did you ever go to any other  24 conferences as part of your job duties at</p>
<p style="text-align: right;">Page 19</p> <p>1 put on by the DEA?  2 A. They did have actual DEA  3 folks there. We wasn't privy to that.  4 We was with the -- I guess the store  5 side, not the actual DEA.  6 I think the gentleman's name  7 was Mr. Buzzeo who was in charge of the  8 conference, which somehow he was  9 connected with Rite Aid.  10 Q. What kind of topics were  11 discussed at the DEA conference you went  12 to?  13 A. I don't remember.  14 Q. Did you get any written  15 materials from that conference?  16 A. I don't remember. It's been  17 so long.  18 Q. Do you remember, just  19 generally, what the topics were at the  20 DEA conference?  21 MR. LAVELLE: Object to  22 form. Objection. Asked and  23 answered.  24 THE WITNESS: I don't</p>	<p style="text-align: right;">Page 21</p> <p>1 Rite Aid?  2 A. Yes.  3 Q. Can you give me an example?  4 A. My -- I went to a conference  5 in, I think, Virginia. And that was on  6 the lines of -- if I can recollect, on  7 the lines of, I guess, pharmacists  8 stealing product, writing scripts or  9 something, people -- you know, something  10 along that line.  11 That was a while ago, too.  12 Q. Was that also over ten years  13 ago?  14 A. That was probably, if I  15 would have to say, 2008, maybe; '07 or  16 '08.  17 Q. And you referred to the  18 conference in Fort Lauderdale as a  19 conference put on by Buzzeo.  20 Do you know who the VA --  21 the Virginia conference was put on by?  22 A. I don't remember.  23 Q. Who else was at that  24 conference with you from Rite Aid?</p>



<p style="text-align: right;">Page 22</p> <p>1 A. Rick Snyder.</p> <p>2 Q. Who is Rick Snyder?</p> <p>3 A. Rick Snyder was one of the</p> <p>4 leads, at the time, for security.</p> <p>5 Q. Was he working at the</p> <p>6 Perryman distribution center?</p> <p>7 A. Yes.</p> <p>8 Q. Anyone else besides Rick</p> <p>9 Snyder go to that conference with you?</p> <p>10 A. Yes.</p> <p>11 Q. Who else?</p> <p>12 A. Ms. Joyce Sweitzer.</p> <p>13 Q. And who is Joyce --</p> <p>14 A. She was --</p> <p>15 Q. -- Sweitzer?</p> <p>16 MR. LAVELLE: Wait until the</p> <p>17 question is finished before you</p> <p>18 answer.</p> <p>19 THE WITNESS: Go ahead.</p> <p>20 BY MR. POWERS:</p> <p>21 Q. Who is Joyce Sweitzer?</p> <p>22 A. They was the asset</p> <p>23 protection manager.</p> <p>24 Q. And was that also for the</p>	<p style="text-align: right;">Page 24</p> <p>1 A. Right, at my job.</p> <p>2 Q. At the Perryman distribution</p> <p>3 center?</p> <p>4 A. Yes. We have a security,</p> <p>5 like a middle meeting area, we left the</p> <p>6 information in case anybody wanted to</p> <p>7 look at it. That was about it.</p> <p>8 Q. Did you ever talk to anyone</p> <p>9 about what you learned at that conference</p> <p>10 in Virginia?</p> <p>11 A. No.</p> <p>12 Q. Do you know what those</p> <p>13 brochures that you left in the middle</p> <p>14 area were about?</p> <p>15 A. I believe, like I said, it</p> <p>16 was about information on people that</p> <p>17 would try to get extra scripts. That's</p> <p>18 about all I can remember of that.</p> <p>19 As I say, that's been a</p> <p>20 while ago as well.</p> <p>21 Q. So you said that you started</p> <p>22 working at Rite Aid in September of 2000,</p> <p>23 right?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 23</p> <p>1 Perryman distribution center?</p> <p>2 A. Yes.</p> <p>3 Q. Anyone else besides Rick</p> <p>4 Snyder and Joyce Sweitzer?</p> <p>5 A. No.</p> <p>6 Q. Besides the conference down</p> <p>7 in Virginia and the Fort Lauderdale</p> <p>8 conferences, any other conferences you</p> <p>9 went to as a Rite Aid employee?</p> <p>10 A. No.</p> <p>11 Q. Did you receive any written</p> <p>12 materials from the conference that you</p> <p>13 went to in Virginia?</p> <p>14 A. Yes.</p> <p>15 Q. What kind of written</p> <p>16 materials did you get?</p> <p>17 A. Some printouts, brochures.</p> <p>18 Q. What did you do with those</p> <p>19 written materials?</p> <p>20 A. We left them at the middle</p> <p>21 office, we call it, if anybody wanted to</p> <p>22 take a look at any of that material.</p> <p>23 Q. You say you left them at the</p> <p>24 middle office?</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. And are you currently still</p> <p>2 employed by Rite Aid?</p> <p>3 A. Yes, I am.</p> <p>4 Q. And from September 2000</p> <p>5 until current, have you always worked at</p> <p>6 the Perryman distribution center?</p> <p>7 A. Yes.</p> <p>8 Q. What was your title when you</p> <p>9 first started at the Perryman</p> <p>10 distribution center?</p> <p>11 A. Security associate.</p> <p>12 Q. How long did you hold the</p> <p>13 position of security associate?</p> <p>14 A. If I can recollect, maybe</p> <p>15 six months.</p> <p>16 Q. After security associate,</p> <p>17 did you have a different position?</p> <p>18 A. Yes.</p> <p>19 Q. What was that position?</p> <p>20 A. They created a position</p> <p>21 called DEA coordinator for security.</p> <p>22 Q. How long were you the DEA</p> <p>23 coordinator for security?</p> <p>24 A. I want to say 2001 until</p>

Page 26

1 present.  
2 Q. Have you ever had any  
3 different titles besides security  
4 associate or DEA coordinator for  
5 security?  
6 A. Yes.  
7 Q. What other titles have you  
8 had?  
9 A. Lead.  
10 Q. And the title is just lead?  
11 There's no --  
12 A. Security lead.  
13 Q. Security lead, okay.  
14 A. Yes.  
15 Q. When did you first get the  
16 title of security lead?  
17 A. 2002.  
18 Q. How long were you a security  
19 lead for?  
20 A. Pretty much up until the --  
21 well, we got the -- we got promoted maybe  
22 two years ago. So I would say from 2002  
23 to 2016, maybe.  
24 Q. You said "we got promoted,"

Page 27

1 what are -- who are you referring to  
2 when --  
3 A. Everybody. Because we went  
4 from leads to supervisors.  
5 Q. So everyone who was a  
6 security lead got promoted to security  
7 supervisor around 2016?  
8 A. Yes, sir.  
9 Q. Why was that?  
10 A. They did a change and  
11 decided to do without the leads  
12 throughout the whole facility. So for  
13 security, they changed us to -- from  
14 leads to supervisors.  
15 Q. So you were both a security  
16 lead and the DEA coordinator for security  
17 from 2002 until around 2016?  
18 A. Until present.  
19 Q. Well, you're not a security  
20 lead any more, you're a security  
21 supervisor, right?  
22 A. Yes, sir.  
23 Q. So you stopped being a  
24 security lead in 2016, correct?

Page 28

1 A. Yes.  
2 Q. So from 2002 to 2016, you  
3 were both a security lead and the DEA  
4 coordinator for security, right?  
5 A. Yes.  
6 Q. Any other titles besides the  
7 ones we've already talked about?  
8 A. No, sir.  
9 Q. As the DEA coordinator for  
10 security, who did you report to?  
11 A. Still to my boss, which was  
12 Nathan Williams at the time.  
13 Q. Was Nathan Williams your  
14 boss the entire time you were a DEA  
15 coordinator for security?  
16 A. No.  
17 Q. Who else was your boss?  
18 A. A gentleman named Joseph  
19 Beck.  
20 Q. Anybody else?  
21 A. Joyce Sweitzer.  
22 Q. Besides Williams, Beck and  
23 Sweitzer, anyone else?  
24 A. In security, I think that

Page 29

1 should be it.  
2 Q. Did you report to anyone  
3 different as a security lead?  
4 A. No.  
5 Q. What department in the  
6 distribution center were you a part of as  
7 a DEA coordinator for security?  
8 A. Could you repeat the  
9 question, please?  
10 Q. Sure.  
11 What department were you a  
12 part of as the DEA coordinator for  
13 security?  
14 A. Security.  
15 Q. There's a department called  
16 the security department at the  
17 distribution center?  
18 MR. LAVELLE: Object to  
19 form.  
20 THE WITNESS: The security  
21 department. Asset protection now.  
22 BY MR. POWERS:  
23 Q. Do you know when it switched  
24 from security to asset protection?



Page 30

Page 32

1 A. I don't remember.  
2 Q. Are there other people who  
3 have held the role of DEA coordinator for  
4 security at the Perryman distribution  
5 center?

6           A.   No.

7 Q. You're the only one who has  
8 that title?

9      A.    Yes.

10 Q. How about security lead,  
11 does anyone else have the title of  
12 security lead for the period of 2002  
13 through 2016?

14 A. Yes.

15 Q. Who else were the security  
16 leads?

17 A. All right. You're going --  
18 I got to go back.

19 Q. The ones you can remember.

20 A. Okay. Ronald Welsh, Derrick  
21 Johnson, Howard Johnson, Richard Snyder,  
22 Jesse Jones.

23 Let's see, who else can I  
24 remember? Cindy Smith.

Page 31

Page 33

1           That's all I can remember.

2 Q. When you started your job as  
3 the DEA coordinator for security, how  
4 were you trained for your -- for that  
5 job?

6       A. I was partnered up with  
7 Kevin Mitchell.

8 O. And who is Kevin Mitchell?

9       A. At the time, Kevin Mitchell  
10 was the DEA for corporate.

11 Q. Kevin Mitchell worked in the  
12 corporate office, not the distribution  
13 center; is that right?

14      A.    Yes, sir.

Page 34

Page 36

Page 34

Category	Percentage
1. [Redacted]	15%
2. [Redacted]	35%
3. [Redacted]	30%
4. [Redacted]	35%
5. [Redacted]	38%
6. [Redacted]	35%
7. [Redacted]	40%
8. [Redacted]	42%
9. [Redacted]	45%
10. [Redacted]	15%
11. [Redacted]	30%
12. [Redacted]	35%
13. [Redacted]	38%
14. [Redacted]	40%
15. [Redacted]	42%
16. [Redacted]	45%
17. [Redacted]	15%
18. [Redacted]	30%
19. [Redacted]	35%
20. [Redacted]	38%
21. [Redacted]	40%
22. [Redacted]	42%
23. [Redacted]	45%
24. [Redacted]	15%
25. [Redacted]	30%
26. [Redacted]	35%
27. [Redacted]	38%
28. [Redacted]	40%
29. [Redacted]	42%
30. [Redacted]	45%
31. [Redacted]	15%
32. [Redacted]	30%
33. [Redacted]	35%
34. [Redacted]	38%
35. [Redacted]	40%
36. [Redacted]	42%
37. [Redacted]	45%
38. [Redacted]	15%
39. [Redacted]	30%
40. [Redacted]	35%
41. [Redacted]	38%
42. [Redacted]	40%
43. [Redacted]	42%
44. [Redacted]	45%
45. [Redacted]	15%
46. [Redacted]	30%
47. [Redacted]	35%
48. [Redacted]	38%
49. [Redacted]	40%
50. [Redacted]	42%
51. [Redacted]	45%
52. [Redacted]	15%
53. [Redacted]	30%
54. [Redacted]	35%
55. [Redacted]	38%
56. [Redacted]	40%
57. [Redacted]	42%
58. [Redacted]	45%
59. [Redacted]	15%
60. [Redacted]	30%
61. [Redacted]	35%
62. [Redacted]	38%
63. [Redacted]	40%
64. [Redacted]	42%
65. [Redacted]	45%
66. [Redacted]	15%
67. [Redacted]	30%
68. [Redacted]	35%
69. [Redacted]	38%
70. [Redacted]	40%
71. [Redacted]	42%
72. [Redacted]	45%
73. [Redacted]	15%
74. [Redacted]	30%
75. [Redacted]	35%
76. [Redacted]	38%
77. [Redacted]	40%
78. [Redacted]	42%
79. [Redacted]	45%
80. [Redacted]	15%
81. [Redacted]	30%
82. [Redacted]	35%
83. [Redacted]	38%
84. [Redacted]	40%
85. [Redacted]	42%
86. [Redacted]	45%
87. [Redacted]	15%
88. [Redacted]	30%
89. [Redacted]	35%
90. [Redacted]	38%
91. [Redacted]	40%
92. [Redacted]	42%
93. [Redacted]	45%
94. [Redacted]	15%
95. [Redacted]	30%
96. [Redacted]	35%
97. [Redacted]	38%
98. [Redacted]	40%
99. [Redacted]	42%
100. [Redacted]	45%

Page 36

Category	Percentage
1	10%
2	95%
3	95%
4	15%
5	65%
6	90%
7	55%
8	65%
9	90%
10	90%
11	95%
12	90%
13	90%
14	90%
15	95%
16	90%
17	15%
18	75%
19	10%
20	90%
21	90%
22	90%
23	90%
24	95%
25	90%
26	15%
27	75%
28	10%
29	90%
30	90%
31	90%
32	90%
33	90%
34	90%
35	90%
36	90%
37	90%
38	90%
39	90%
40	90%
41	90%
42	90%
43	90%
44	90%
45	90%
46	90%
47	90%
48	90%
49	90%
50	90%
51	90%
52	90%
53	90%
54	90%
55	90%
56	90%
57	90%
58	90%
59	90%
60	90%
61	90%
62	90%
63	90%
64	90%
65	90%
66	90%
67	90%
68	90%
69	90%
70	90%
71	90%
72	90%
73	90%
74	90%
75	90%
76	90%
77	90%
78	90%
79	90%
80	90%
81	90%
82	90%
83	90%
84	90%
85	90%
86	90%
87	90%
88	90%
89	90%
90	90%
91	90%
92	90%
93	90%
94	90%
95	90%
96	90%
97	90%
98	90%
99	90%
100	90%

Page 35

Page 37

Page 35

Page 37

[illegible]

23 Q. I'm going to hand you what's  
24 been marked as Ringgold Exhibit-1. It's

A horizontal bar chart titled "U.S. should take action to address climate change." The y-axis lists age groups: 18-29, 30-49, 50-64, 65+, and "Total". The x-axis represents the percentage of respondents, ranging from 0 to 100 in increments of 10. For each age group, there are two bars: a blue bar for "Men" and a red bar for "Women". The data is as follows:

Age Group	Men (%)	Women (%)
18-29	85	85
30-49	80	80
50-64	75	75
65+	70	70
Total	75	75

<sup>1</sup> Bates number Rite\_Aid\_OMDL\_0049982  
<sup>2</sup> through 49993.

3                  \_ \_ \_

(Whereupon,  
Rite Aid-Ringgold Exhibit-1,  
Rite Aid\_OMDL\_0049982-993, was  
marked for identification.)

8 \_ \_ \_

<sup>9</sup> BY MR. POWERS:

10 Q. Just take a brief look at  
11 that and just let me know when you're  
12 done.

13 Does this document,  
14 Exhibit-1, look familiar to you?

15 A. Yes, it does.

16 Q. What is the document  
17 reflected in Exhibit-1?

Device Type	Percentage of Respondents
Smartphone	92%
Tablet	88%
Smartwatch	75%
Smart TV	68%
Smart Home Hub	62%
Smart Car	55%
Smart Thermostat	48%
Smart Light Bulbs	42%
Smart Doorbell	35%
Smart Lock	28%

A horizontal bar chart titled 'U.S. should take action to protect the environment'. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'All Americans'. The x-axis represents the percentage of respondents, ranging from 0 to 100. The bars show the following approximate percentages: 18-29 (95%), 30-49 (85%), 50-69 (80%), 70+ (65%), and All Americans (90%).

Age Group	Percentage of Respondents
18-29	95%
30-49	85%
50-69	80%
70+	65%
All Americans	90%

Page 42

Page 44

[illegible]

Row	Bar Length (approx. % of total width)
1	10
2	90
3	85
4	20
5	50
6	90
7	95
8	25
9	70
10	45
11	90
12	10
13	95
14	100
15	20
16	80
17	90
18	60
19	15
20	85
21	95
22	70
23	100
24	75
25	10

Page 43

Page 45

[illegible]

A horizontal bar chart titled "U.S. should take action to address climate change." The y-axis lists age groups: 18-29, 30-49, 50-64, 65+, and "Don't know." The x-axis represents the percentage of respondents, ranging from 0% to 100% in 10% increments. For each age group, there are two bars: a blue bar for "Men" and an orange bar for "Women." The data shows that younger age groups (18-29 and 30-49) have higher percentages of respondents who believe the U.S. should take action, while older age groups (50-64 and 65+) have lower percentages. The "Don't know" category shows a significantly higher percentage for men (40%) compared to women (10%).

Age Group	Men (%)	Women (%)
18-29	85	80
30-49	80	75
50-64	55	50
65+	30	25
Don't know	40	10

24 [REDACTED]. LAVELLE: Object to  
form.

Page 46

1 [REDACTED]  
2 Q. You can put that exhibit  
3 aside.  
4 - - -  
5 (Whereupon,  
6 Rite Aid-Ringgold Exhibit-2,  
7 Rite\_Aid\_OMDL\_0032421, was marked  
8 for identification.)  
9 - - -  
10 (Whereupon,  
11 Rite Aid-Ringgold Exhibit-3,  
12 Rite\_Aid\_OMDL\_0032422, was marked  
13 for identification.)  
14 - - -  
15 BY MR. POWERS:  
16 Q. I'm going to hand you next  
17 what's been marked as Exhibits-2 and 3.  
18 The first exhibit, Exhibit-2, is Bates  
19 stamped Rite\_Aid\_OMDL\_0032421. And then  
20 Exhibit-3, which is the e-mail attachment  
21 to Exhibit-2, is Bates stamped  
22 Rite\_Aid\_OMDL\_0032422.  
23 And the Exhibit-3 is -- has  
24 a bunch of pages. I'm just going to ask

Page 47

1 you about a couple of questions -- I'm  
2 just going to ask you a couple of  
3 questions about a couple particular  
4 pages.  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

Page 48

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

Page 49

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

<div>[REDACTED]</div>	<div>Page 52</div> <div>1 time limit on trying to close cases.</div> <div>2 Q. Those would be shortage</div> <div>3 claim cases?</div> <div>4 A. Yes.</div> <div>5 Q. What was the time limit to</div> <div>6 close those?</div> <div>7 A. I believe we had 48 hours.</div> <div>8 Q. And what did you do to close</div> <div>9 a shortage claim case?</div> <div>10 A. Just investigate.</div> <div>11 Q. What did you do to</div> <div>12 investigate?</div> <div>13 A. I would start getting</div> <div>14 information from either Debra Chase,</div> <div>15 Marian Woods or Keith Frost.</div> <div>16 Q. What kind of information</div> <div>17 would you get from those individuals?</div> <div>18 A. Who picked, who was the</div> <div>19 person that picked it, who was the person</div> <div>20 that inventoried it at the desk. And</div> <div>21 from there, [REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>
-----------------------	--

<div>[REDACTED]</div>	<div>Page 53</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>9 Q. So when you have an X in the</div> <div>10 column closed here on Page 3 of</div> <div>11 Exhibit-3, what does the X there mean in</div> <div>12 the closed column?</div> <div>13 A. Meaning we were done.</div> <div>14 Meaning, we close it out on the security</div> <div>15 side.</div> <div>16 Q. Does that mean you found the</div> <div>17 missing product?</div> <div>18 A. On that particular one, I</div> <div>19 can't -- I could not say yes or no to.</div> <div>20 But it was closed out on our end.</div> <div>21 Q. Where would you find the</div> <div>22 information about how this was closed</div> <div>23 out?</div> <div>24 A. Repeat that question,</div>
-----------------------	--



Page 54

1 please.  
2 Q. Yes. Maybe it wasn't the  
3 best question.  
4 So it's marked closed on  
5 this tracking sheet. Where would I find  
6 the information about how this particular  
7 claim for negative 2 bottles of  
8 hydrocodone/APAP went?  
9 A. Where it went? Normally, if  
10 I can go back in my memory, I believe  
11 when I say closed, meaning it was found.  
12 Q. Was there any record of  
13 where the -- where the product was found,  
14 besides just the information here that it  
15 was closed?  
16 A. I don't remember.  
17 Q. In the next row down, it  
18 looks like it's for Store 7766?  
19 A. Yes.  
20 Q. And over in the shortage  
21 claim column, it says, One each, and in  
22 parentheses, Rx overstock.  
23 Do you see that?  
24 A. I do.

Page 55

1 Q. What does that mean?  
2 A. That might have been the  
3 area where it was. I don't remember.  
4 Q. Would a positive number in  
5 the shortage claim column here represent  
6 that the store got an extra unit of  
7 whatever the product name was?  
8 A. I don't remember.  
9 Q. Do you still use these sort  
10 of weekly investigation tracking sheets?  
11 A. No.  
12 Q. When did you stop using  
13 them?  
14 A. Once we stopped doing the  
15 drug investigations back in 2014.  
16 Q. So these weekly  
17 investigation tracking sheets were only  
18 for controlled drugs?  
19 A. I can't remember.  
20 Q. Did you personally fill out  
21 these weekly investigation tracking  
22 sheets?  
23 A. Yes.  
24 Q. Did anyone else?

Page 56

1 A. I can't remember.  
2 But I'm sure if I was out,  
3 my boss -- I mean, they still -- things  
4 still have to go on if I'm not there,  
5 so --  
6 Q. And what did you use these  
7 tracking sheets for after they were  
8 filled out?  
9 A. I didn't use them for  
10 anything.  
11 Q. Do you know if your boss  
12 used them for anything?  
13 A. I could not say.  
14 Q. Do you know if anyone else  
15 used them for anything?  
16 A. I could not say. I would  
17 not know.  
18 Q. So besides just filling  
19 these out, that's your involvement with  
20 them?  
21 A. Yes. Like I said, my role  
22 was small. Yes.  
23 Q. You can put that exhibit  
24 over to the side, Mr. Ringgold.

Page 57

1 - - -  
2 (Whereupon,  
3 Rite Aid-Ringgold Exhibit-4,  
4 Rite\_Aid\_OMDL\_0027551-552, was  
5 marked for identification.)  
6 - - -  
7 BY MR. POWERS:  
8 Q. I've got an Exhibit-4 here.  
9 And the Bates number on this exhibit is  
10 Rite\_Aid\_OMDL\_0027551 through 7552.  
11 Go ahead and take a look at  
12 that.  
13 A. Thank you.  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

Page 58

[REDACTED]

Page 60

[REDACTED]

Page 59

[REDACTED]

Page 61

[REDACTED]

Page 62

[REDACTED]

Page 64

[REDACTED]

2 Q. Okay. That's all. We're

3 done with that exhibit.

4 - - -

5 (Whereupon,

6 Rite Aid-Ringgold Exhibit-5,

7 Rite\_Aid\_OMDL\_21461-463, was

8 marked for identification.)

9 - - -

10 BY MR. POWERS:

11 Q. I want to hand you what's

12 been marked as Exhibit-5. It is an

13 e-mail string, and the Bates number is

14 Rite\_Aid\_OMDL\_21461 through 21463.

15 Take a second to review

16 that.

17 A. Thank you.

18 Q. I'll direct your attention

19 to the second-to-last page of Exhibit-5.

[REDACTED]

Page 63

[REDACTED]

Page 65

[REDACTED]

2 Do you see that?

3 A. I do.

4 Q. Who is Kim Brown?

5 A. She might have had something

6 to do with Rx at the time. I can't

7 remember her exact position.

8 Q. How about Tahir Senoussa?

9 A. Same. He was one of the

10 managers at the time. He might have been

11 in Rx at the time as well.

12 Q. And is M. Wood, Marian Wood?

13 A. That is correct.

14 Q. And D. Chase, is that Debra

15 Chase?

16 A. Yes.

17 Q. And L.N. Ringgold, is that

18 you, Larry Ringgold?

19 A. That is correct.

20 Q. How come you copied yourself

21 on this e-mail?

22 A. I don't remember.

23 Q. You say in the e-mail, Hello

24 to all. I would like to have a quick

Page 66

1 briefing with day and night shift  
2 associates that work in the cage. I just  
3 want to go over a few procedures with the  
4 scanning of their badges in and out of  
5 the cage. I would like to get with all  
6 the cage associates next week.  
7 Do you see that?  
8 A. I do.  
9 Q. What were you referring to  
10 here when you wanted -- when you were  
11 referring to the procedures about  
12 scanning their badges in and out of the  
13 cage?  
14 A. We had a few folks that was  
15 getting locked in the cage. So what was  
16 happening, they wasn't doing a proper  
17 swipe. They would swipe in. But to go  
18 out, sometimes if you hit it twice, it  
19 would think you were still in the cage  
20 but you would actually be out.  
21 So I just had to explain to  
22 them how to swipe in and out, because we  
23 were getting a lot of calls to the front,  
24 hey, I'm stuck in the cage. So we had to

Page 67

1 let them know, hey, when it happens,  
2 don't swipe it, just call us and we would  
3 hit the anti-passback button.  
4 So I just wanted to brief  
5 folks on that. That was it.  
6 Q. Going to the first page of  
7 Exhibit-5, at the bottom there, it looks  
8 like an e-mail from Marian Wood to you  
9 saying, Larry, would it be possible for  
10 Kim and I to see what you are going over  
11 with them?  
12 Do you see that?  
13 A. I do.  
14 Q. In the e-mail above that,  
15 it's Marian Wood just to Kim Brown,  
16 saying, Kim, I want to be sure what he is  
17 going over and make sure it is in line  
18 with our procedures.  
19 Do you see that?  
20 A. I do.  
21 Q. And Marian -- excuse me, Kim  
22 Brown responded, at the top e-mail, there  
23 to Marian Wood, Good call, dot, dot, dot.  
24 Do you see that?

Page 68

1 A. I do.  
2 Q. Why did -- do you know why  
3 Marian Wood and Kim Brown wanted to see  
4 what you were going over with the cage  
5 associates?  
6 MR. LAVELLE: Object to  
7 form.  
8 THE WITNESS: I would -- I  
9 don't know why, no.  
10 BY MR. POWERS:  
11 Q. It sounds like Marian Wood  
12 wanted to make sure it's in line with the  
13 procedures of the distribution center,  
14 right?  
15 MR. LAVELLE: Object to  
16 form.  
17 THE WITNESS: According to  
18 the e-mail.  
19 BY MR. POWERS:  
20 Q. Was there any time when you  
21 gave procedures that were not in line  
22 with the procedures at the Rite Aid  
23 distribution center?  
24 A. Not that I'm aware of.

Page 69

1 Q. It seems like Marian Wood  
2 thinks there were, right, from that  
3 e-mail on the first page of Exhibit-5?  
4 MR. LAVELLE: Object to  
5 form.  
6 THE WITNESS: I couldn't  
7 speculate for Marian.  
8 BY MR. POWERS:  
9 Q. And it seems like Kimberly  
10 Brown agrees, because she says, Good  
11 call.  
12 Do you see that at the top  
13 there?  
14 A. I see that.  
15 MR. LAVELLE: Object to  
16 form.  
17 BY MR. POWERS:  
18 Q. You can place that exhibit  
19 to the side.  
20 - - -  
21 (Whereupon,  
22 Rite Aid-Ringgold Exhibit-6,  
23 Rite\_Aid\_OMDL\_23456-457, was  
24 marked for identification.)

Page 70

1           - - -  
2 BY MR. POWERS:  
3       Q. I'm going to hand you what's  
4 been marked as Ringgold Exhibit-6. It is  
5 Bates stamped Rite\_Aid\_OMDL\_23456 through  
6 23457.  
7       A. Thank you.

[REDACTED]

Page 71

[REDACTED]

Page 72

[REDACTED]

Page 73

[REDACTED]

Page 74

1 Do you see that?

2 A. I do.

3 Q. So Marian Wood is saying

4 that you kept a log of all the Rx cage

5 and vault tests, right?

6 MR. LAVELLE: Object to

7 form. Objection. Vague.

8 The question is about the

9 e-mails that Mr. Ringgold was not

10 copied on and did not send or

11 receive.

12 MR. POWERS: John, just

13 objection to form is fine.

14 BY MR. POWERS:

15 Q. Mr. Ringgold, did you keep a

16 log of the Rx cage and vault tests?

17 A. I did not keep a log.

18 Q. You did not keep a log?

19 A. No.

20 Q. Did anyone keep a log of the

21 Rx cage and vault tests?

22 A. Not a log. I kept a -- an

23 actual report.

24 Q. So you kept all of the

Page 75

1 reports that were generated from the

2 tests?

3 A. We had to.

4 Q. What kind of report was

5 generated from these tests?

6 A. Just to show that the alarms

7 were working and the motion tests were

8 going off.

9 Q. Was it a written report?

10 A. It was -- yes. Not really

11 written, but just showed actual motion 1,

12 motion 2, whatever, that it would go off.

13 And that was part of the DEA

14 compliance.

15 Q. Was that a -- was that,

16 like, a printout or something or --

17 A. Yes, it was a printout

18 from --

19 MR. LAVELLE: Wait until the

20 question is finished before you

21 answer it.

22 THE WITNESS: Yes.

23 MR. LAVELLE: Otherwise the

24 record is going to be messed up.

Page 76

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

Page 77

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]



Age Group	Percentage of Respondents
18-29	85%
30-39	75%
40-49	70%
50-59	65%
60+	55%

22 MR. LAVELLE: Counsel, is  
23 this a convenient time? We've  
24 been going for over an hour. Can

1 (Whereupon,  
2 Rite Aid-Ringgold Exhibit-7,  
3 Rite\_Aid\_OMDL\_0012020-021, was  
4 marked for identification.)  
5 - - -  
6 BY MR. POWERS:  
7 Q. I'm going to hand you what  
8 has been marked as Exhibit-7. And the  
9 Bates number on this exhibit is  
10 Rite\_Aid\_OMDL\_0012020 through 12021.  
11 Take a look at that e-mail.  
12 A. Thank you.

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5
Total	95	5

1 we take a break?

2 MR. POWERS: We can take a

3 break if you'd like. I'll say, if

4 you want to power through for

5 another 20 minutes or so, we might

6 be all ready to go home.

7 MR. LAVELLE: I appreciate  
8 that, but I do need to use the  
9 restroom.

10 MR. POWERS: We'll take a  
11 short break, then.

12 VIDEO TECHNICIAN: The time  
13 is now 6:07 p.m. We are going off  
14 the record.

15                      -    -    -

16 (Whereupon, a brief recess  
17 was taken.)

18                -   -   -

19 VIDEO TECHNICIAN: The time  
20 is now 6:20 p.m. We are back on  
21 the record.

22 BY MR. POWERS:

23 Q. Welcome back, Mr. Ringgold.

24 - - -

A horizontal bar chart titled 'U.S. should take action to protect the environment'. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'All Americans'. The x-axis represents the percentage of respondents, ranging from 0 to 100 in increments of 10. The bars show the following approximate percentages: 18-29 (85%), 30-49 (90%), 50-69 (88%), 70+ (82%), and All Americans (88%).

Age Group	Percentage of Respondents
18-29	85%
30-49	90%
50-69	88%
70+	82%
All Americans	88%

Page 82

[REDACTED]

Page 84

[REDACTED]

Page 83

[REDACTED]

Page 85

[REDACTED]

Page 86

Page 88

Page 87

Page 89

Page 90

[REDACTED]

9 Q. I'm going to move on to a  
10 new exhibit here. You can put that one  
11 to the side.  
12 - - -  
13 (Whereupon,  
14 Rite Aid-Ringgold Exhibit-8,  
15 Rite\_Aid\_OMDL\_0011115-116, was  
16 marked for identification.)  
17 - - -  
18 BY MR. POWERS:  
19 Q. I marked Ringgold Exhibit-8,  
20 it is a two-page document with the Bates  
21 number Rite\_Aid\_OMDL\_0011115 through  
22 11116.  
[REDACTED]

Page 91

[REDACTED]

Page 92

[REDACTED]

Page 93

[REDACTED]

Page 94

Page 96

Group	Should take action	Should not take action
All respondents	85%	15%
Male	83%	17%
Female	87%	13%
18-29	88%	12%
30-49	85%	15%
50-69	82%	18%
70+	78%	22%

Country	Percentage of respondents who believe that the U.S. should take action to address climate change
U.S.	88%
France	87%
Germany	86%
Canada	85%
China	84%
India	83%
Japan	82%
South Korea	81%
U.K.	71%

Page 95

Page 97

[illegible]

Group	Should Take Action (%)	Should Not Take Action (%)
All respondents	85	15
Gender		
Male	86	14
Female	84	16
Age		
18-29	87	13
30-49	85	15
50-69	84	16
70+	83	17
Education		
High school or less	84	16
Some college	85	15
Bachelor's or higher	86	14

Page 98

[REDACTED]

Page 100

[REDACTED]

5 - - -

6 (Whereupon,

7 Rite Aid-Ringgold Exhibit-10,

8 Rite\_Aid\_OMDL\_0010795-796, was

9 marked for identification.)

10 - - -

11 BY MR. POWERS:

12 Q. I'll hand you an exhibit

13 that's been marked Exhibit-10. It's

14 Bates stamped Rite\_Aid\_OMDL\_0010795

15 through 0010796.

16 A. Thank you.

[REDACTED]

Page 99

[REDACTED]

Page 101

[REDACTED]



Page 102

[REDACTED]

Page 104

[REDACTED]

19 Q. You can put that exhibit to  
20 the side.  
21 I want to go back to  
22 something we were talking about earlier,  
23 the Buzzeeo conference that you went to  
24 down in Fort Lauderdale.

Page 103

[REDACTED]

Page 105

1 Do you know why you were  
2 selected to go to that particular  
3 conference?  
4 A. I don't remember. I believe  
5 because I was security DEA.  
6 Q. Who made that decision that  
7 you would go to that conference?  
8 MR. LAVELLE: Object to  
9 form.  
10 THE WITNESS: I wouldn't  
11 know. It could have possibly been  
12 the GM. I'm not sure.  
13 BY MR. POWERS:  
14 Q. And how about the conference  
15 in Virginia that you went to with Rick  
16 Snyder, Joyce Sweitzer, do you know why  
17 you were selected to go to that  
18 conference?  
19 A. I do not.  
20 Q. Who told you that you could  
21 go to that conference?  
22 A. Ms. Joyce Sweitzer.  
23 Q. Is there any reason why you  
24 didn't attend any other Buzzeeo

Page 106

1 conferences after the one you attended in  
2 Fort Lauderdale?  
3 A. Budget.  
4 Q. How do you know that?  
5 A. I think we were -- we wanted  
6 to go to some other stuff, but they said  
7 because of budgets, we could not go.  
8 Q. Do you know when that was?  
9 A. I do not remember, no.  
10 Q. Did anyone from the Perryman  
11 distribution center go to those other  
12 Buzzeo conferences that you were not able  
13 to?  
14 A. I wouldn't know.  
15 MR. POWERS: That's all I  
16 have.  
17 MR. LAVELLE: I have some  
18 brief questioning of the witness,  
19 but I guess we should switch  
20 places.  
21 VIDEO TECHNICIAN: The time  
22 is now 6:47 p.m. We're going off  
23 the record.  
24 - - -

Page 107

1 (Whereupon, a brief recess  
2 was taken.)  
3 - - -  
4 VIDEO TECHNICIAN: The time  
5 is now 6:54 p.m. We are back on  
6 the record.  
7 - - -  
8 EXAMINATION  
9 - - -  
10 BY MR. LAVELLE:  
11 Q. Hello, Mr. Ringgold. John  
12 Lavelle, representing Rite Aid. I have  
13 just a few questions for you.  
14 I'd like to ask you first  
15 to -- following up on the documents  
16 Ringgold-8 and 9 that were discussed with  
17 you by counsel for plaintiff earlier.  
18 Do you have those in front  
19 of you, sir?  
20 A. Yes, I do.  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

Page 108

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

Page 109

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

Page 110

[REDACTED]

Page 112

1 Ringgold-11.  
2 A. I've read it.  
3 Q. Mr. Ringgold, do you  
4 recognize this document we've marked for  
5 identification as Ringgold-11?  
6 A. Yes, I do.  
7 Q. What is it?

[REDACTED]

Page 111

[REDACTED]

8 Q. All right. I'd like to mark  
9 an exhibit.  
10 - - -  
11 (Whereupon,  
12 Rite Aid-Ringgold Exhibit-11,  
13 Rite\_Aid\_OMDL\_0003562, was marked  
14 for identification.)  
15 - - -  
16 BY MR. LAVELLE:  
17 Q. Mr. Ringgold, I'm going to  
18 give you what we've marked for  
19 identification as Ringgold-11.  
20 Please take a look at it and  
21 tell me when you've had a chance to  
22 review it.  
23 It is Bates number  
24 Rite\_Aid\_OMDL\_0003562. Again, that's

Page 113

[REDACTED]

Page 114

[REDACTED]

Page 116

[REDACTED]

Page 115

[REDACTED]

18 Q. What do you have -- what did  
19 you say in the next sentence of this  
20 e-mail?  
21 A. Shannon started the tote and  
22 did go by the pick list order.  
23 Q. And what does that mean?  
24 A. We get an actual pick list

Page 117

[REDACTED]

Page 118

[REDACTED]

Page 120

[REDACTED]

Page 119

[REDACTED]

Page 121

[REDACTED]

Page 122

[REDACTED]

Page 124

[REDACTED]

Page 123

[REDACTED]

Page 125

[REDACTED]

Page 126

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 MR. LAVELLE: I have no  
12 further questions.  
13 MR. POWERS: I don't have  
14 any follow-up.  
15 VIDEO TECHNICIAN: The time  
16 is now 7:11 p.m. This concludes  
17 today's deposition. We're going  
18 off the record.  
19 - - -  
20 (Whereupon, the deposition  
21 concluded at 7:11 p.m.)  
22 - - -  
23  
24

Page 127

1 CERTIFICATE  
2  
3  
4 I HEREBY CERTIFY that the  
5 witness was duly sworn by me and that the  
6 deposition is a true record of the  
7 testimony given by the witness.  
8  
9  
10  
11 Amanda Maslynsky-Miller  
12 Certified Realtime Reporter  
13 Dated: January 27, 2019  
14  
15  
16  
17 (The foregoing certification  
18 of this transcript does not apply to any  
19 reproduction of the same by any means,  
20 unless under the direct control and/or  
21 supervision of the certifying reporter.)  
22  
23  
24

Page 128

1 INSTRUCTIONS TO WITNESS  
2  
3 Please read your deposition  
4 over carefully and make any necessary  
5 corrections. You should state the reason  
6 in the appropriate space on the errata  
7 sheet for any corrections that are made.  
8 After doing so, please sign  
9 the errata sheet and date it.  
10 You are signing same subject  
11 to the changes you have noted on the  
12 errata sheet, which will be attached to  
13 your deposition.  
14 It is imperative that you  
15 return the original errata sheet to the  
16 deposing attorney within thirty (30) days  
17 of receipt of the deposition transcript  
18 by you. If you fail to do so, the  
19 deposition transcript may be deemed to be  
20 accurate and may be used in court.  
21  
22  
23  
24

Page 129

1 -----  
2 E R R A T A  
3 -----  
4 PAGE LINE CHANGE/REASON  
5 \_\_\_\_\_  
6 \_\_\_\_\_  
7 \_\_\_\_\_  
8 \_\_\_\_\_  
9 \_\_\_\_\_  
10 \_\_\_\_\_  
11 \_\_\_\_\_  
12 \_\_\_\_\_  
13 \_\_\_\_\_  
14 \_\_\_\_\_  
15 \_\_\_\_\_  
16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 \_\_\_\_\_  
19 \_\_\_\_\_  
20 \_\_\_\_\_  
21 \_\_\_\_\_  
22 \_\_\_\_\_  
23 \_\_\_\_\_  
24 \_\_\_\_\_

Page 130

ACKNOWLEDGMENT OF DEPONENT

I, \_\_\_\_\_, do  
hereby certify that I have read the  
foregoing pages, 1 - 126, and that the  
same is a correct transcription of the  
answers given by me to the questions  
therein propounded, except for the  
corrections or changes in form or  
substance, if any, noted in the attached  
Errata Sheet.

LARRY RINGGOLD \_\_\_\_\_ DATE \_\_\_\_\_

Subscribed and sworn  
to before me this  
\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

My commission expires: \_\_\_\_\_

Notary Public \_\_\_\_\_

Page 131

LAWYER'S NOTES

PAGE LINE

1	_____	_____	_____
2	_____	_____	_____
3	_____	_____	_____
4	_____	_____	_____
5	_____	_____	_____
6	_____	_____	_____
7	_____	_____	_____
8	_____	_____	_____
9	_____	_____	_____
10	_____	_____	_____
11	_____	_____	_____
12	_____	_____	_____
13	_____	_____	_____
14	_____	_____	_____
15	_____	_____	_____
16	_____	_____	_____
17	_____	_____	_____
18	_____	_____	_____
19	_____	_____	_____
20	_____	_____	_____
21	_____	_____	_____
22	_____	_____	_____
23	_____	_____	_____
24	_____	_____	_____